

# **EXHIBIT L**



IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

JASON WILLIAMS,  
Plaintiff,

ORIGINAL

vs.

Case No. 5:19-cv-00475-BO

AT&T MOBILITY, LLC,  
Defendant.

**\*\*HIGHLY CONFIDENTIAL\*\***  
DEPOSITION OF ROBERT ARNO  
30(b)(6)

February 28, 2022

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12:03 p.m. to 4:27 p.m. EST

REMOTELY REPORTED VIA VIDEO CONFERENCING

REPORTED BY:

Tamara L. Houston  
CA CSR No. 7244, RPR, CCRR No. 140  
FILE NO. 22-108895



1 THE WITNESS: I don't recall from other  
2 sources.

3 (Witness instructed not to answer.)

4 BY MR. GALLO:

14:15:41 5 Q. Did you review any documents as part of  
6 your investigation into Mr. Williams' SIM swaps?

7 MS. STAGG: Objection. It calls for  
8 attorney-client privileged communications and  
9 attorney work product.

14:15:51 10 And on that basis, I instruct you not to  
11 answer.

12 (Witness instructed not to answer.)

13 BY MR. GALLO:

14 Q. Did you speak with anyone, besides your  
14:16:00 15 attorneys or AT&T's attorneys, to gather facts as  
16 part of your investigation into Mr. Williams' SIM  
17 swaps?

18 MS. STAGG: That calls for attorney work  
19 product and attorney-client privileged  
14:16:12 20 communications.

21 And on that basis, I instruct you not to  
22 answer.

23 (Witness instructed not to answer.)

24 BY MR. GALLO:

14:16:19 25 Q. Outside of, again, your attorneys or AT&T's



1 attorneys, did you speak with anyone at all about  
2 your investigation into Mr. Williams' SIM swaps or  
3 the facts you learned as part of your investigation?

4 MS. STAGG: Same objections.

14:16:30 5 I'm sorry. Could you read the question  
6 back again.

7 (Record read.)

8 MS. STAGG: Same instruction. Calls for  
9 attorney-client privileged communications and  
14:16:59 10 attorney work product.

11 And on that basis, I instruct you not to  
12 answer.

13 (Witness instructed not to answer.)

14 MR. GALLO: Okay. And, Nancy, just for the  
14:17:06 15 record, is it -- are you instructing your client not  
16 to answer any questions about what documents he  
17 reviewed or who he spoke to in connection with his  
18 investigation?

19 MS. STAGG: Yes. So, you know, as we've  
14:17:20 20 indicated on the privilege log, his entire  
21 investigation relating to Mr. Williams was done at  
22 the direction of counsel. So even anyone he spoke to  
23 in conducting that investigation, it's work product.  
24 It's privileged.

14:17:36 25 So, yeah, so -- yeah, so anything that he



1 did in connection -- you know, I've given you  
2 latitude to ask generally about what he does in asset  
3 protection and how he goes about an investigation,  
4 but we're going to object to anything with regard to  
14:17:52 5 specifically because that was done at the direction  
6 of counsel.

7 MR. GALLO: Okay. And I think my question  
8 so far was only whether or not he reviewed any  
9 documents, not which documents he reviewed. Are you  
14:18:05 10 persistent in that objection with respect to that?

11 MS. STAGG: Yeah, sure. Sure. Because  
12 what he -- what he chooses to do in this case all  
13 relates -- rolls up into the work that he did at the  
14 direction of counsel.

14:18:15 15 MR. GALLO: And same thing with respect to  
16 whether or not he spoke to anybody?

17 MS. STAGG: Yes.

18 MR. GALLO: All right.

19 Okay. Lalindra, can you pull up Exhibit  
14:18:30 20 20, please, which we'll now mark as Arno Number 4, I  
21 believe.

22 (Whereupon Exhibit 4 was marked for  
23 identification.)

24 BY MR. GALLO:

14:18:44 25 Q. Okay. All right. So this, I'll represent,